

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	05-187 (ESH)
v.	:	
	:	
MARK CALLAHAM	:	
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UNOPPOSED MOTION TO AMEND RELEASE ORDER

Mark Callaham, through undersigned counsel, respectfully moves this Honorable Court, for an order allowing him to be in the area of the stay away in this case when in the company of either undersigned counsel's investigator or undersigned counsel, for the purpose of assisting in locating a defense witness. In support of this motion, counsel states the following:

1. Mr. Callaham was released by this Court with an order to stay out of a ten block radius from Hunter Place SE, the location of the traffic stop in this matter.
2. Undersigned counsel's investigator has requested that Mr. Callaham assist him in locating a defense witness who lives within the stay away area. Pierre Russell is counsel's investigator working on this matter.
3. Counsel has been in contact with Anthony Scarpelli, the Assistant United States Attorney assigned to this matter. He does not oppose this request.

WHEREFORE, for the foregoing reasons and for such other reasons that may appear meritorious to the Court, Mark Callaham and counsel respectfully request that this Honorable Court grant this motion and sign the attached order.

Respectfully submitted,

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